

REMARKS

Claims 16-57 and 62 were previously canceled. Claims 58 and 61 are amended. Claims 1-15 and 58-61 remain in the application for consideration. In view of the following, Applicant respectfully requests that the rejections be withdrawn and that the application be forwarded on to issuance.

The Claim Rejections

Claims 1-3, 5-8, 11 and 58-61 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,778,949 to Duan et al. (hereinafter "Duan").

Claim 14 stands rejected under 35 U.S.C. § 103(a) as being obvious over Duan in view of Official Notice taken by the Office.

Claims 4, 9, 12-13 and 15 stand rejected under 35 U.S.C. § 103(a) as being obvious over Duan in view of U.S. Patent No. 6,092,034 to McCarley et al. (hereinafter "McCarley").

Claim 9 stands rejected under 35 U.S.C. § 103(a) as being obvious over Duan in view of U.S. Patent No. 6,139,201 to Carbonell et al. (hereinafter "Carbonell").

The Claims

Claim 1 recites a reading system comprising [emphasis added]:

- *a user interface configured to allow a user to select text in a non-native language and view a translation of the selected text in a native language; and*
- *a cross-language reading wizard comprising:*
- *a parser for parsing selected text into individual translation units,*

- 1 • a word translation selector for choosing candidate word translations
2 for the translation units, and
3 • a translation generator for translating the candidate word translations
4 into corresponding words or phrases in the native language that can
5 be presented to the user via the user interface.

6 In making out the rejection of this claim, the Office argues that Duan
7 discloses all of this claim's subject matter and hence, in the Office's opinion,
8 anticipates this claim. The Office did not, however, address the claim feature that
9 appears highlighted above, i.e. the user interface. Applicant respectfully submits
10 that Duan does not disclose or suggest this feature, i.e. a user interface that both
11 allows a user to select text in a non-native language and view a translation of the
12 selected text in a native language.

13 As a non-limiting example of subject matter that embodies the spirit of this
14 feature, the Office is respectfully referred to the Specification, starting on page 21,
15 line 7. There, examples of a user interface that allows a user to *select* text and
16 view a translation of the selected text is provided.

17 Duan does discuss the notion of how text is input into its system in column
18 5, lines 1-10. Specifically, Duan instructs that text may be directly input into its
19 system by a person typing sentences into a keyboard or through the output of
20 another system, such as a speech recognition system or an optical character
21 recognition system. Duan does not disclose or discuss a user interface that both
22 allows a user to select text *and* view a translation of the selected text.

23 Accordingly, this claim is not anticipated by Duan and is allowable.

24 Claims 2-13 depend from claim 1 and are allowable as depending from an
25 allowable base claim. In addition, given the allowability of claim 1, the Office's

1 reliance on McCarley and Carbonelli in making out the rejections of claims 4, 9,
2 10 and 12-13 are not seen to add anything of significance.

3 **Claim 14 recites a reading system comprising [emphasis added]:**

- 4
- 5 • *a user interface configured to allow a user to select English*
6 *language text and view a Chinese language translation of the*
7 *selected text; and*
8 • a cross-language reading wizard comprising:
9 • a parser for parsing selected text into individual translation units,
10 • a word translation selector for choosing candidate word translations
11 for the translation units, and
12 • a translation generator for translating the candidate word translations
13 into corresponding phrases in the Chinese language that can be
14 presented to the user via the user interface.

15 In making out the rejection of this claim, the Office admits that Duan does
16 not teach a user interface as recited in this claim. The Office then takes Official
17 Notice that it is old and well-known in the art to select English language text *in*
18 *view of a second language such as Chinese for a translation of the selected text.*

19 Applicant disagrees and respectfully submits that the Office has not
20 established a *prima facie* case of obviousness. Specifically, this claim recites that
21 the user interface allows a user to select English language text *and* view a Chinese
22 language translation. Examples of subject matter embodied by the spirit of this
23 claim have been cited above. This claim does not recite, as the Office appears to
24 believe, that the user interface allows a user to select English language text *in view*
25 *of a second language.* Thus, it appears that the Office has mischaracterized the
claim.

Nonetheless, Applicant disagrees with the Office's Official Notice and
respectfully requests that if the subject matter of this claim that pertains to the user

1 interface is well known, the Office produce a reference that indicates such is the
2 case. Accordingly, the Office has not established a *prima facie* case of
3 obviousness and this claim is allowable.

4 **Claim 15** depends from claim 14 and is allowable as depending from an
5 allowable base claim. In addition, given the Office's failure to establish a *prima*
6 *facie* case of obviousness, the Office's reliance on McCarley in making out the
7 rejection of claim 15 is not seen to add anything of significance.

8 **Claim 58** has been amended and, as amended, recites a reading system
9 comprising [added language appears in blood italics]:

- 10 • *a user interface configured to allow a user to select text in a non-*
11 *native language and view a translation of the selected text in a*
12 *native language, wherein the user interface displays text*
13 *translations adjacent text the user has selected for translation; and*
- 14 • a cross-language reading wizard comprising:
- 15 • a parser for parsing selected text into individual translation units, the
16 parser comprising a part-of-speech/base noun phrase identification
17 module for tagging individual words with identifiers,
- 18 • a word translation selector for choosing candidate word translations
19 for the translation units, and
- 20 • a translation generator for translating the candidate word translations
21 into corresponding words or phrases in the native language that can
22 be presented to the user via the user interface.

23 In making out the rejection of this claim, the Office argues that it is
24 anticipated by Duan. Applicant has amended this claim as noted above.
25 Applicant respectfully submits that Duan neither discloses nor suggests the subject
matter of this claim. Accordingly, this claim is not anticipated by Duan and is
allowable.

1 **Claims 59 and 60 depend from claim 58 and are allowable as depending**
2 **from an allowable base claim.**

3 **Claim 61 has been amended and, as amended, recites one or more**
4 **computer readable media having computer-readable instructions thereon which,**
5 **when executed by one or more processors, cause the one or more processors to**
6 **implement a cross-language reading wizard comprising [added language appears**
7 **in bold italics]:**

- 8 • ***a user interface configured to allow a user to select text in a non-***
- 9 ***native language and view a translation of the selected text in a***
- 10 ***native language;***
- 11 • a parser for parsing selected text into individual translation units, the
12 parser comprising a part-of-speech/base noun phrase identification
13 module for tagging individual words with identifiers,
- 14 • a word translation selector for choosing candidate word translations
15 for the translation units, and
- 16 • a translation generator for translating the candidate word translations
17 into corresponding words or phrases in the native language that can
18 be presented to the user via the user interface.
- 19 • translating the candidate word translations to corresponding words
20 and/or phrases in the native language to provide text that has been
21 translated from the non-native-language into a native language; and
- 22 • present translated text to the user via the user interface.

23
24
25 In making out the rejection of this claim, the Office argues that the claim is
19 anticipated by Duan. Applicant has amended this claim as noted above. For the
20 reasons set forth above, Duan does not anticipate this claim. Accordingly, this
21 claim is allowable.
22

1 **Conclusion**

2 Applicant respectfully submits that all of the claims are in condition for
3 allowance. In the event the Office's next anticipated action is to be anything other
4 than issuance of a Notice of Allowability, Applicant respectfully requests a telephone
5 call for the purpose of scheduling an interview.

6
7 Respectfully Submitted,

8 Dated: 4/4/05

9 By: 

10 Lance R. Sadler
11 Reg. No. 38,605
12 (509) 324-9256 ext. 226